

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

**PURDUE PHARMA L.P., *et al.*,

Debtors.¹**

Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

DECLARATION OF JESSE DELCONTE

¹ The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Pursuant to 28 U.S.C. § 1746, I, Jesse DelConte, hereby declare as follows under penalty of perjury:

1. On August 3, 2021, I submitted an expert report entitled the *Amended Expert Report of Jesse DelConte* (the “**DelConte Expert Report**”),¹ which attached and incorporated by reference in its entirety the hypothetical chapter 7 liquidation analysis that was filed as Appendix B to the Disclosure Statement.² JX-2761 – JX-2765 is a true and accurate copy of the DelConte Expert Report and appendices thereto.

2. Nothing that I have learned since the submission of my amended report has changed any of my opinions expressed therein. I reserve the right to revise my opinions in light of my ongoing review of materials, including data, documents, and depositions or other testimony that may subsequently come to light.

3. In accordance with my understanding of paragraph 4.h of the *Third Amended Order Granting Debtors’ Motion for Order Establishing Confirmation Schedule and Protocols* [Docket No. 3347], I respectfully submit this Declaration and the DelConte Expert Report attached hereto as my direct testimony on behalf of the Debtors. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

¹ The DelConte Expert Report amends a prior report that I submitted on June 15, 2021 entitled the *Expert Report of Jesse DelConte*. The amendments corrected an inconsistent statement in a chart where the correct information was provided in the attached exhibits, and caught a few typos.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Debtors’ *Sixth Amended Joint Chapter 11 Plan of Reorganization of Purdue Pharma L.P. and Its Affiliated Debtors* [Dkt. No. 3185] (the “**Plan**”) or the *Fifth Amended Disclosure Statement for the Fifth Amended Joint Chapter 11 Plan of Reorganization of Purdue Pharma, L.P., et al., Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 2983] (as may be subsequently supplemented, amended, or modified from time to time, the “**Disclosure Statement**”), as applicable.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing
is true and correct.

Executed on: August 5, 2021

/s/ *Jesse Del Conte*

Jesse DelConte